

<u>20a</u> <u>20b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 756 for \$391.95 on or about 11/20/98	Whirlpool appliance for a member of the Asselin or Sotirion family
<u>21a</u> <u>21b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 755 for \$4,100.00 on or about 11/22/98	Bosch dishwasher, General Electric refrigerator, Whirlpool stove, and another Whirlpool appliance for a member of the Asselin or Sotirion family
<u>22a</u> <u>22b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 762 for \$1,390.20 on or about 12/21/98	Personal electronic equipment for members of the Asselin or Sotirion family
<u>23a</u> <u>23b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 770 for \$3,390.00 on or about 02/09/99	Granite countertop installed in the residence of defendants RAYMOND and JANET ASSELIN, SR.
<u>24a</u> <u>24b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 779 for \$1,500.00 on or about 06/08/99	Check delivered to defendant SOTIRION and subsequently cashed
<u>25a</u> <u>25b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 781 for \$482.55 on or about 06/24/99	Payment for four new tires on defendant JANET ASSELIN's Chrysler LeBaron
<u>26a</u> <u>26b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 782 for \$6,630.00 on or about 06/24/99	Approximately 40,000 to 60,000 letters and 30,000 to 40,000 envelopes for defendant CHRISTOPHER ASSELIN's 1998 campaign for state representative

<u>27a</u> <u>27b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 784 for \$792.68 on or about 07/07/99	Lumber and materials for a new deck at defendant JAMES ASSELIN's residence
<u>28a</u> <u>28b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 789 for \$6,750.00 on or about 07/26/99	New residential roof and barn roof at the residence of defendant SOTIRION's sister
<u>29a</u> <u>29b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 793 for \$1,125.00 on or about 08/11/99	Pressure treated decking, two storm windows, and a load of mulch installed at defendant SOTIRION's rental property
<u>30a</u> <u>30b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 794 for \$2,375.00 on or about 08/11/99	Automotive work on defendant SOTIRION's personal vehicles and his daughter's Ford Taurus
<u>31a</u> <u>31b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 802 for \$8,314.78 on or about 08/21/99	New indoor air conditioning system installed at the residence of defendant RAYMOND and JANET ASSELIN, SR.
<u>32a</u> <u>32b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 809 for \$1,267.13 on or about 09/02/99	Sliding french door installed at the residence of defendant ASSELIN, JR.
<u>33a</u> <u>33b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 820 for \$1,167.00 on or about 09/27/99	Forty twenty foot lengths of Trex decking installed on the deck of a member of the Asselin or Sotirion family

<u>34a</u> 34b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 822 for \$921.78 on or about 10/01/99	Payment for lumber and materials at the residence of defendant ASSELIN, JR.
<u>35a</u> 35b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 824 for \$1,000.00 on or about 10/01/99	Gas grill purchased by defendant SOTIRION
<u>36a</u> 36b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 825 for \$8,400.00 on or about 10/07/99	Windows and gutters installed at the residence of defendant JAMES ASSELIN
<u>37a</u> 37b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 826 for \$5,334.00 on or about 10/08/99	Frigidaire stove and refrigerator for the residence of defendant MARIA SERRAZINA; and a General Electric microwave, Jenn-Air stove, and Whirlpool washer and dryer for the residence of defendant JAMES ASSELIN
<u>38a</u> 38b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 828 for \$1,500.00 on or about 10/21/99	Check delivered to defendant SOTIRION and subsequently cashed
<u>39a</u> 39b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 834 for \$6,000.00 on or about 11/08/99	Check delivered to defendant SOTIRION and subsequently cashed
<u>40a</u> 40b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 836 for \$4,850.00 on or about 11/22/99	Cedar fence installed at the residence of defendant SOTIRION
<u>41a</u> 41b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 841 for \$800.00 on or about 12/21/99	Four mirrors installed at the residence of JOSEPH and MELINDA ASSELIN

<u>42a</u> <u>42b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 845 for \$2,460.00 on or about 01/05/00	Digital camera, a DVD player, and other pieces of electronic equipment received by defendant SOTIRION
<u>43a</u> <u>43b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 847 for \$2,130.00 on or about 01/14/00	Reconditioned transmission and other automotive work on the personal vehicle of defendant SOTIRION's daughter
<u>44a</u> <u>44b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 848 for \$1,864.00 on or about 01/20/00	Payment for a coin wrapping machine for defendant ASSELIN, SR. and defendant SOTIRION's quarter skimming scheme
<u>45a</u> <u>45b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 853 for \$50,000.00 on or about 03/17/00	First installment of \$100,000.00 payment to defendant SOTIRION on behalf of his brother
<u>46a</u> <u>46b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check Nos. 865 and 879 totaling \$1,114.13 on or about 05/05/00	Lumber and materials for a new deck at the residence of defendant RAYMOND ASSELIN, JR.
<u>47a</u> <u>47b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 884 for \$630.00 on or about 06/24/00	Catering services for a campaign function held on behalf of defendant CHRISTOPHER ASSELIN
<u>48a</u> <u>48b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 893 for \$3,059.00 on or about 07/26/00	Automotive work on defendant JANET ASSELIN's Chrysler LeBaron and other personal vehicles belonging to members of the Asselin and Sorition family

<u>49a</u> 49b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 923 for \$50,000.00 on or about 08/15/00	Final installment of \$100,000.00 payment to defendant SOTIRION on behalf of his brother
<u>50a</u> 50b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 946 for \$493.50 on or about 10/02/00	Hanson twenty pound gas grill propane cylinders and a Ducane gas grill replacement part for members of the Asselin and Sotirion families
<u>51a</u> 51b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1000 for \$2,430.00 on or about 11/08/00	Body work on defendant SOTIRION's 1991 Cadillac and defendant JANET ASSELIN'S 1992 Chrysler LeBaron
<u>52a</u> 52b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1014 for \$800.00 on or about 11/15/00	Check delivered to defendant SOTIRION and subsequently cashed
<u>53a</u> 53b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1053 for \$3,139.35 on or about 01/17/01	Dell Pentium computer, office table, and highback leather chair for defendant CHRISTOPHER ASSELIN's office, and a 32" Sony television delivered to the residence of defendant ARTHUR SOTIRION
<u>54a</u> 54b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1067 for \$5,957.51 on or about 05/21/01	New windows at the residences of defendants CHRISTOPHER and MERYLINA ASSELIN, and defendant ASSELIN, JR.

<u>55a</u> <u>55b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1070 for \$650.00 on or about 04/20/01	Tree service work to prepare for the installation of an in-ground swimming pool at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
<u>56a</u> <u>56b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1078 for \$725.00 on or about 05/08/01	Approximately twenty-five water filters for defendant ASSELIN, SR.
<u>57a</u> <u>57b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1079 for \$2,100.00 on or about	Labor to install new windows at the residences of defendants CHRISTOPHER and MERYLINA ASSELIN, and defendant ASSELIN, JR.
<u>58a</u> <u>58b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1083 for \$8,100.00 on or about 05/16/01	Partial payment of an in-ground swimming pool and slide installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
<u>59a</u> <u>59b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1089 for \$2,100.00 on or about 06/08/01	Partial payment of in-ground swimming pool and slide installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN

<u>60a</u> <u>60b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1094 for \$5,928.69 on or about 06/29/01	An alarm system installed at the residence of defendant MARIA SERRAZINA; a central vacuum system and an updated alarm panel installed at the rental property of defendant ARTHUR SOTIRION; and a global positioning system device for an automobile
<u>61a</u> <u>61b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1104 for \$6,000.00 on or about 08/26/01	Carport roof installed at the residence of defendants RAYMOND and JANET ASSELIN, SR.; construction of a front porch at the residence of defendant MARIA SERRAZINA; and various roof jobs at the residence of defendant ARTHUR SOTIRION's father
<u>62a</u> <u>62b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1120 for \$5,000.00 on or about 09/06/01	Exterior painting of the residence of defendants CHRISTOPHER and MERYLINA ASSELIN, and trim work at the residence of defendants JOSEPH and MELINDA ASSELIN
<u>63a</u> <u>63b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	G & R Associates, Inc. Check No. 1129 for \$2,480.00 on or about 10/15/01	Approximately 20,000 to 30,000 campaign letters and 10,000 to 15,000 campaign envelopes for defendant CHRISTOPHER ASSELIN

<u>64a</u> 64b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1130 for \$3,502.89 on or about 10/15/01	Washer and dryer delivered by Lowes to the residence of defendants CHRISTOPHER and MERYLINA ASSELIN; Sony recorder delivered to defendant SOTIRION; Big E tickets and an Olympus digital camera for members of the Asselin or Sotirion families
<u>65a</u> 65b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1137 for \$661.50 on or about 11/14/01	Payment for seven hundred fifty (750) invitations and response cards for the Dolly Asselin Retirement Party
<u>66a</u> 66b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1161 for \$1,165.50 on or about 12/15/01	Two upright Hoover vacuums and a Canon copier for members of the Asselin and Sotirion families
<u>67a</u> 67b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1163 for \$600.00 on or about 12/27/01	One hundred Showcase Cinema movie tickets delivered to defendant SOTIRION
<u>68a</u> 68b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1166 for \$4,150.00 on or about 01/02/02	12' by 16' outdoor shed, built to match the existing house, installed at the residence of defendants JOSEPH and MELINDA ASSELIN
<u>69a</u> 69b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1168 for \$255.00 on or about 01/09/02	Four new tires on a personal vehicle of a member of the Asselin family or Sotirion family



<u>70a</u> 70b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1169 for \$1,870.00 on or about 01/08/02	Reconditioned transmission and other automotive work in defendant SOTIRION's personal vehicle
<u>71a</u> 71b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1187 for \$1,725.00 on or about 02/15/02	Reconditioned transmission and other automotive work on defendant SOTIRION's Cadillac Brougham
<u>72a</u> 72b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1202 for \$7,000.00 on or about 03/15/02	Survey work at the Whately residence of defendant SOTIRION's sister
<u>73a</u> 73b	<u>18 USC 201</u> MGL Ch 268	G & R Associates, Inc. Check No. 1211 for \$1,570.00 on or about 04/17/02	Catering services for a political event for defendant CHRISTOPHER ASSELIN

#### Racketeering Acts 74 through 97

37. Racketeering Acts 74 through 97 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.**  
**and**  
**ARTHUR SOTIRION,**

defendants herein, being a public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from Manny's Plumbing & Heating, Inc. and Manny's Plumbing & Heating, Inc./G & R Associates, Inc., a Joint Venture, all in return for and with

the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Manny's Plumbing & Heating, Inc. and Manny's Plumbing & Heating, Inc./G & R Associates, Inc., a Joint Venture, all in violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

**RAYMOND ASSELIN, SR.**  
**and**  
**ARTHUR SOTIRION,**

defendants herein, being a state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from Manny's Plumbing & Heating, Inc. and Manny's Plumbing & Heating, Inc./G & R Associates, Inc., a Joint Venture, in return for being influenced in the performance of any official act or act within his official

responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Manny's Plumbing & Heating, Inc. and Manny's Plumbing & Heating, Inc./G & R Associates, Inc., a Joint Venture, all in violation of Massachusetts General Laws, Chapter 268, Sections 2(b)(1), (2) and (3):

<u>Act</u>	<u>Violation</u>	<u>Thing of Value for Act a and b and Date</u>	<u>Beneficiary of Act a and b</u>
74a 74b	18 USC 201 MGL Ch 268	\$4,000.00 worth of free labor and materials on or about the fall, 1996	Plumbing installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
75a 75b	18 USC 201 MGL Ch 268	\$10,201.52 worth of free labor and materials between 10/28/97 through 01/05/99	Plumbing system installed at the new residence of defendants JOSEPH and MELINDA ASSELIN
76a 76b	18 USC 201 MGL Ch 268	Manny's Plumbing & Heating, Inc. Check Nos. 2305, 2419 and 3085 for \$10,000.00 between 12/08/97 and 04/28/98	Heating and air conditioning systems installed at the new residence of defendants JOSEPH and MELINDA ASSELIN

<u>77a</u> <u>77b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$2,131.42 worth of free labor and materials on or about 11/20/98	Stainless steel sink, sewage ejector and hot water heater installed at RayTron, Inc., the business of defendant ASSELIN, JR.
<u>78a</u> <u>78b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1033 for \$2,525.00 on or about 12/02/98	New house roof and shed roof at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
<u>79a</u> <u>79b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$1,500.00 worth of free labor and materials in or about late 1998 and early 1999	Plumbing services performed at the residence of defendants RAYMOND and JANET ASSELIN, SR.
<u>80a</u> <u>80b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$308.00 worth of free labor and materials on or about 03/25/99	Plumbing services for work done at the residence of defendant ARTHUR G. SOTIRION's parents
<u>81a</u> <u>81b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 4855 for \$8,015.27 on or about 06/26/99	A Black Quartz Corian kitchen countertop installed at the residence of defendant SOTIRION
<u>82a</u> <u>82b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc. payment of approximately \$3,000.00 in or about the fall, 1999	Labor related to the kitchen remodeling at the residence of defendant SOTIRION
<u>83a</u> <u>83b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc. Check No. 1104 for \$27,450.00 on or about 01/20/00	Repayment of loan taken from employer by defendant JOSEPH ASSELIN

<u>84a</u> 84b	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc. Check No. for \$6,718.58 on or about 02/14/00	Kitchen cabinets installed at the residence of SHA's Chief Purchasing Agent
<u>85a</u> 85b	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1129 for \$30,000.00 on or about 04/12/00	Money to Valley Floor Covering
<u>86a</u> 86b	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$12,245.68 worth of free labor and materials between on or about 11/00/99 and 06/00/00	Plumbing system installed at the residence of SHA's Chief Purchasing Agent
<u>87a</u> 87b	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1162 for \$7,500.00 on or about 06/19/00	Siding, gutters, and several pairs of shutters installed at the residence of SHA's Chief Purchasing Agent
<u>88a</u> 88b	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$25,000.00 in cash paid through a series of cash payments beginning in or about September, 2000	Cash to defendant SOTIRION
<u>89a</u> 89b	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$5,000.00 in cash paid through a series of cash payments beginning in or about September, 2000	Cash to defendant SOTIRION
<u>90a</u> 90b	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1270 for \$450.00 on or about 11/16/00	Twenty "Chris Asselin State Representative" signs measuring four feet by five feet for defendant CHRISTOPHER ASSELIN

<u>91a</u> <u>91b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1281 for \$2,800.00 on or about 12/12/00	New engine in SHA's Chief Purchasing Agent's van
<u>92a</u> <u>92b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1294 for \$8,700.00 on or about 12/27/00	Approximately 60,000 to 80,000 letters and 40,000 to 50,000 envelopes for defendant CHRISTOPHER ASSELIN's 2000 campaign for state representative
<u>93a</u> <u>93b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc. Check No. 7591 for \$787.97 on or about 03/22/01	Five maple kitchen cabinet units for the residence of defendant JAMES ASSELIN
<u>94a</u> <u>94b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$1,678.16 worth of free plumbing materials and services on or about 08/01/01	Plumbing services at the rental property of defendant SOTIRION
<u>95a</u> <u>95b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	Manny's Plumbing & Heating, Inc. Check No. 9399 for \$122,800.00 on or about 06/10/02	Payment related to the purchase of an insurance agency by defendant JOSEPH ASSELIN
<u>96a</u> <u>96b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$258.56 worth of free plumbing materials and services on or about 06/14/02	Plumbing services at the rental property of defendant SOTIRION
<u>97a</u> <u>97b</u>	<u>18 USC 201</u> <u>MGL Ch 268</u>	\$5,958.05 worth of free plumbing materials and services on or about 09/30/02	Plumbing services for the installation of a 400,000 BTU pool heater at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN

**Racketeering Acts 98 through 110**

38. Racketeering Acts 98 through 110 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.**  
**and**  
**ARTHUR SOTIRION,**

defendants herein, being a public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from Peter Davis, d/b/a P.J. Richfield, Inc., all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Peter Davis, d/b/a P.J. Richfield, Inc., all in violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

**RAYMOND ASSELIN, SR.**  
**and**  
**ARTHUR SOTIRION,**

defendants herein, being a state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from Peter Davis, d/b/a P.J. Richfield, Inc., in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Peter Davis, d/b/a P.J. Richfield, Inc., all in violation of Massachusetts General Laws, Chapter 268, Sections 2(b)(1), (2) and (3);

c. On or about the following dates, in the District of Massachusetts,

**PETER DAVIS,**

defendant herein, did directly and indirectly corruptly give, offer, and promise anything of value to a public official, that



is defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, all with the intent to influence an official act of said public official; to influence said public official to commit and to aid in committing, and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and to induce said public official to do and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Peter Davis, d/b/a P.J. Richfield, Inc., all in violation of Title 18, United States Code, Sections 201(b)(1)(A), (B), and (C);

d. On or about the following dates, in the Commonwealth of Massachusetts,

**PETER DAVIS,**

defendant herein, did directly and indirectly corruptly give, offer, and promise anything of value to any state employee, that is defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, with intent to influence any official act or any act within the official responsibility of said state employee; to influence said state employee to commit and aid in committing, and to collude in, and allow, any fraud, and make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and to induce said state employee to do and

omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Peter Davis, d/b/a P.J. Richfield, Inc., all in violation of Massachusetts General Laws, Chapter 268, Sections 2(a)(1), (2) and (3):

<u>Act</u>	<u>Violation</u>	<u>Thing of Value for Act a, b, c and d and Date</u>	<u>Beneficiary of Act a, b, c and d</u>
98a 98b 98c 98d	18 USC 201 MGL Ch 268 18 USC 201 MGL Ch 268	P.J. Richfield, Inc. Check No. 1077 for \$2,491.32 on or about 09/30/96	New cherry kitchen cabinets at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
99a 99b 99c 99d	18 USC 201 MGL Ch 268 18 USC 201 MGL Ch 268	P.J. Richfield, Inc. Check No. 1079 for \$2,000.00 on or about 10/01/96	Exterior painting at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
100a 100b 100c 100d	18 USC 201 MGL Ch 268 18 USC 201 MGL Ch 268	P.J. Richfield, Inc. Check No. 1080 for \$350.00 on or about 10/01/96	Labor to install ceramic tile at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
101a 101b 101c 101d	18 USC 201 MGL Ch 268 18 USC 201 MGL Ch 268	P.J. Richfield, Inc. Check No. 1081 for \$720.00 on or about 10/02/96	Sanding and refinishing five rooms at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN

<u>102a</u> <u>102b</u> <u>102c</u> <u>102d</u>	<u>18 USC 201</u> <u>MGL Ch 268</u> <u>18 USC 201</u> <u>MGL Ch 268</u>	P.J. Richfield, Inc. Check No. 1571 for \$7,400.00 on or about 09/22/97	Labor for the framing of the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>103a</u> <u>103b</u> <u>103c</u> <u>103d</u>	<u>18 USC 201</u> <u>MGL Ch 268</u> <u>18 USC 201</u> <u>MGL Ch 268</u>	P.J. Richfield, Inc. Check No. 1576 for \$1,338.24 on or about 10/07/97	Fourteen storm windows installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
<u>104a</u> <u>104b</u> <u>104c</u> <u>104d</u>	<u>18 USC 201</u> <u>MGL Ch 268</u> <u>18 USC 201</u> <u>MGL Ch 268</u>	P.J. Richfield, Inc. Check No. 1570 for \$8,200.00 on or about 10/03/97	Lumber and other construction materials for the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>105a</u> <u>105b</u> <u>105c</u> <u>105d</u>	<u>18 USC 201</u> <u>MGL Ch 268</u> <u>18 USC 201</u> <u>MGL Ch 268</u>	P.J. Richfield, Inc. Check No. 1580 for \$11,600.00 on or about 10/12/97	Lumber and other construction materials for the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>106a</u> <u>106b</u> <u>106c</u> <u>106d</u>	<u>18 USC 201</u> <u>MGL Ch 268</u> <u>18 USC 201</u> <u>MGL Ch 268</u>	P.J. Richfield, Inc. Check No. 1579 for \$12,400.00 on or about 10/14/97	Labor for the framing of the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>107a</u> <u>107b</u> <u>107c</u> <u>107d</u>	<u>18 USC 201</u> <u>MGL Ch 268</u> <u>18 USC 201</u> <u>MGL Ch 268</u>	P.J. Richfield, Inc. Check Nos. 1599 and 1606 totaling \$6,000.00 on or about 11/13/97 and 11/16/97	Fireplace and brickwork at the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>108a</u> <u>108b</u> <u>108c</u> <u>108d</u>	<u>18 USC 201</u> <u>MGL Ch 268</u> <u>18 USC 201</u> <u>MGL Ch 268</u>	P.J. Richfield, Inc. Check No. 1604 for \$1,154.05 on or about 11/16/97	Four double hung windows at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN

<u>109a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Lumber and other
<u>109b</u>	<u>MGL Ch 268</u>	Check No. 1615 for	construction
<u>109c</u>	<u>18 USC 201</u>	\$7,925.00 on or about	materials for the
<u>109d</u>	<u>MGL Ch 268</u>	12/01/97	new residence of
			defendants JOSEPH
			and MELINDA ASSELIN
<u>110a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Lumber and other
<u>110b</u>	<u>MGL Ch 268</u>	Check No. 1630 for	construction
<u>110c</u>	<u>18 USC 201</u>	\$3,900.00 on or about	materials for the
<u>110d</u>	<u>MGL Ch 268</u>	12/17/97	new residence of
			defendants JOSEPH
			and MELINDA ASSELIN

### **Racketeering Acts 111 through 118**

39. Racketeering Acts 111 through 118 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.**  
and  
**ARTHUR SOTIRION,**

defendants herein, being a public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from John Spano, d/b/a Valley Floor Covering, Inc., all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation